

14 September 2020

Senior Planner, Planning Department, Waterford City and County Council, Menapia Building, The Mall, Waterford City.

Re: Issues Paper for the Waterford City and County Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing the *Waterford City and County Development Plan* 2022-2028 Pre-Draft Strategic Issues Paper. The Office acknowledges and welcomes the publication of this paper and your authority's work more broadly in advancing the preparation of the Waterford City and County Development Plan (the plan).

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the National Planning Framework (NPF) and the Southern Regional Assembly Regional Spatial and Economic Strategy (RSES);
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the Office in writing.

The Office has set out some comments for your authority to consider in formulating the draft plan. These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your planning authority to comply with the relevant legislative requirements.

Introduction

The publication of the Issues Paper for the Waterford City and County Development Plan 2022-2028 initiates formal public and stakeholder engagement in the process of preparing the development plan.

The Office recognises the significance of this development plan, given it is the first unitary plan for Waterford, and its coincidence with the designation of Waterford, city and suburbs, as a city targeted for growth to 2040¹.

The preparation of this new unitary plan will require collaboration with neighbouring authorities to allow the forthcoming development plan to successfully align with the National Planning Framework (NPF), the Regional Spatial Economic Strategy (RSES) for the Southern Regional Assembly (SRA) and the provisions of the Act.

Consultation Strategies

The Office commends the planning authority for the innovative methods used to inform the public about the review of the plan.

In particular, the Office welcomes the use of video to promote the plan which encourages members of the public to make a submission. The planning authority's use of public webinars will also stimulate public awareness and is welcomed.

The Office would appreciate feedback on the effectiveness of the planning authority's consultation approach in due course.

Waterford Metropolitan Area

The Office recognises the challenge and the unique opportunity that the National Planning Framework presents for Waterford city and suburbs, and the entire south east region over the medium term and to 2040².

¹ NPF, Table 4.1

² National Policy Objective (NPO) 3b, NPO 7 & NPO 8.

Waterford City and suburbs is one of four cities targeted with 50% - 60% population growth to 2040³ as part of an overall objective to counter balance growth in the Greater Dublin Area⁴. The growth of the Waterford Metropolitan Area Strategic Plan (MASP) will stimulate further growth in the county and the region, and thus contribute to Waterford achieving critical mass which will attract significant benefits to the city region in terms of employment, services and amenities.

The targeted growth for Waterford, as set out in the NPF, is supported with capital expenditure which will ensure planning is aligned with infrastructure investment⁵. A number of key enablers have been identified for Waterford and these key developments will generate further growth within the MASP.

At a strategic level, some of the key enablers include the North Quays Innovation District, provision of a sustainable transport bridge connecting north and south quays, provision of a new city transport hub for bus and rail transport, establishing a new strategic cycleway network, the expansion of the city's third level institution and investment in Waterford Port and Waterford Airport to enhance international connectivity to the entire region.

Fulfilling the growth targets of Waterford city and suburbs as a driver for the region will necessitate funding, investment, delivery of infrastructure and collaboration between metropolitan areas and the forthcoming development plan should give thorough consideration to the provision of these core policy objectives which are supported by SRA RSES⁶.

Core Strategy & Settlement Strategy

The formulation of the Core Strategy in line with section 10 of the Act is the most significant element in developing the draft plan.

The NPF and the RSES, in addition to relevant specific planning policy requirements (SPPRs) specified in Ministerial guidelines issued under section 28 of the Act, will be key determinants in making the Core Strategy for the planning authority's functional area. The forthcoming draft development plan will determine a hierarchy of settlement⁷ and appropriate growth rates that shall be consistent with regional and national policy.

³ NPF, Table 4.1

⁴ NPO 7, NPO 8

⁵ National Development Plan 2018 – 2027

⁶ RPO 6, RPO 7, RPO 8, RPO 9

⁷ RPO 3

As the planning authority will be aware, the NPF Roadmap⁸ identifies a target population for Waterford of 132,000-135,000 by 2026, and 137,000-144,000 by 2031. This represents a population increase for the county of 16,000-19,000 people to 2026, above its 2016 census figure of 116,000 people. For Waterford to grow at these targeted rates, the intercensal growth in Waterford from 2021 to 2026, and 2026 to 2031, needs to outperform population growth in recent intercensal periods⁹.

Waterford, city and suburbs, and Dungarvan, have been designated as a 'Metropolitan Area' for growth and a 'Key Town' respectively within the strategic vision of the RSES¹⁰. In relation to the Waterford MASP, the key area of focus will be to achieve a balanced concentric growth model targeting brownfield sites and reusing vacant lands with good connectivity. The NPF sets out a population growth target for Waterford city and suburbs from 54,000 in 2016 to a minimum target population of 81,000 people by 2040¹¹. Delivering on these targets will require collaboration between metropolitan areas¹².

The Office notes and welcomes reference within the Issues Paper to the challenges faced within the Waterford MASP and the overall settlement strategy;

'Recent trends suggest an imbalance in the type of housing i.e. social, middle and high end, in different locations leading to undue segregation which is evident between neighbourhoods in Waterford City and Dungarvan, between Tramore and Waterford City and between housing in the open countryside and rural settlements. To this end there needs to be a balance to ensure that appropriate and affordable housing is available in the right locations.....'

The Office understands that forthcoming updates to the Development Plan Guidelines by the Department of Housing, Planning and Local Government, in addition to the publication of guidance in relation to Housing Need Demand Assessment (which is a requirement of the NPF¹³), will provide enhanced guidance for the preparation of development plans and their core strategies.

The RSES has designated Dungarvan as a 'Key Town' and this allows Dungarvan to act as a 'driver for West Waterford'. A primary objective of the NPF is to drive growth in all designated growth centres as well as all towns and villages with more sustained urban focused development.

⁸ Appendix 2, Implementation Roadmap for the National Planning Framework 2018

⁹ Waterford City and County, experienced population increase of 7.6% in 2006 – 2016. Average population increase in SRA, 2006 – 2016, was 9.9%.

¹⁰ RSES, Table 3.2

¹¹ NPO 8

¹² RPO 6

¹³ NPO 37

The Office advises that the core strategy shall have appropriate consideration for towns such as Tramore, and other smaller towns and villages within committing range of Waterford, as they have the potential to develop unsustainable commuting patterns which would adversely impact on settlement strategies within the Waterford MASP. The network of smaller towns will play their role in the settlement hierarchy however any expansion of towns or villages shall be in a sequential manner and aligned with infrastructure.

The alignment of land zonings with infrastructure and services is a key component of both national and regional policy¹⁴. The NPF sets out a two-tier approach to land zoning referred to as the tiered approach to land zoning. In this regard, the planning authority's attention is drawn to the requirement in NPO 72a which states:

'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.'

Further information regarding the above is provided in Appendix 3 of the NPF: A Methodology for a Tiered Approach to Land Zoning.

The Office advises that the planning authority's forthcoming rural settlement strategy should provide an appropriate balance between policies supporting rural housing and those that proactively address issues of town / village decline and compact growth. Smaller rural villages and settlements can provide an alternative to rural housing and the draft development plan should provide for these opportunities consistent with both regional planning policy objectives¹⁵ and national planning policy objectives¹⁶. The Office welcomes the following statement in the Issues Paper;

> 'The primary aim of these smaller settlements is to create sustainable and vibrant communities which will act as district and local service centres to their hinterlands proportionate to their scale, function and their access to public services and facilities'.

The delivery of such settlements in rural areas will require consideration of practical implementation policy measures which shall include land activation and proactive facilitation of the building of homes within the footprint of rural settlements. These initiatives have the potential to alleviate pressure on the open countryside through provision of a desirable alternative to one-off housing.

¹⁴ RPO 4, NPO 72a

¹⁵ RPO 26 (e), RPO 26 (f), RPO (g) & RPO 27 (d).

¹⁶ NPO 16, NPO 18 (a), NPO 18 (b)

In summary, the overall population target for the county in the Core Strategy is required to be consistent with the NPF Implementation Roadmap, with the projected growth of settlements also required to be consistent with the policy objectives of the NPF and the RSES concerning the distribution of population growth. The Office can provide further practical advice and technical support in the preparation of the Core Strategy parameters above and within our statutory remit as the planning authority may require.

Compact Growth

Compact growth is a fundamental national planning policy objective¹⁷ and the NPF particularly highlights the need to identify infill and brownfield opportunities to intensify housing and employment development throughout existing built-up footprints. The benefits of such an approach for Waterford are multiple and include the potential to achieve more homes and jobs in the city through high quality and high density mixed use development, continued support of existing services and infrastructure, and facilitating people to live and work within a reasonable distance.

The urban consolidation targets of 50% for Waterford city and suburbs¹⁸, and 30% for Dungarvan¹⁹, will require the reutilisation of both large and small 'brownfield' land / infill sites, and underutilised lands at locations that are well served by existing and planned public transport. The Office considers that the draft development plan should include an implementation strategy²⁰ and measures for achieving national and regional targets which would be consistent with RPO 10 of the RSES.

Furthermore, and related to this pivotal issue, the RSES has identified the need to establish a collaborative approach with other metropolitan areas and regions identified for strategic growth areas. Multi-authority collaboration will ensure that a proactive land management of land and building resources within existing settlements are used to their full potential²¹.

In this regard, the Office advises that a significant proportion of the county's future population growth will need to be allocated to the Waterford MASP, the Key Town of Dungarvan, and larger settlements consistent with the RSES.

Urban Regeneration

The policy objectives in the draft development plan shall ensure that they promote and enhance urban areas as attractive places to live and work accommodating diverse and integrated communities²². The Office advises that the forthcoming development plan sets out strategic

¹⁷ NPO 2(a), NPO 3(a) NPO 3 (b), NPO 3 (c),

¹⁸ NPO 3 (b)

¹⁹ RPO 11 (c)

²⁰ RPO 34

²¹ RPO 6

²² NPO 4

regeneration sites, for both residential and employment, having regard to Section 7.3 and Section 8.6 of the RSES respectively.

The NPF recognises that the regeneration and rejuvenation of cities, towns and villages of all types and scale can play a role in making stronger urban places, thus making these areas attractive places to live and work, in both the rural and urban settlements.

In this regard, the Office welcomes the following statement in the Issues Paper: 'The built environment impacts on our quality of life. Good urban design is crucial in creating attractive vibrant places and spaces in which we live, work and play'.

The NPF supports the use of performance based standards for infill / brownfield development stating:

'In particular, general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.'²³

In this regard, there is an opportunity to review the current development management standards in the plan, in particular the sections dealing with standards for residential and apartment development, to ensure they are consistent with the relevant and any updated section 28 guidelines.

Transport & Infrastructure

The Office notes that the Issues Paper highlights the significance of Waterford's strategic location and its exceptional road, rail, sea and air transport infrastructure, ensuring that the region has ready access to national and international markets.

Mobility and economic prosperity are intrinsically linked and the Office advises that the preparation of the Local Transport Plans²⁴ in the forthcoming draft development plan, and the Waterford Metropolitan Area Transport Strategy²⁵, in liaison with key stakeholders, will ensure an integrated land use and transportation approach. These evidence-based strategies shall be used to inform the forthcoming development plan including land use and transportation objectives.

The Office acknowledges that sustainable transport and mobility will play a significant role in improving connectivity to the region which will enhance the future social, economic and physical

²³ NPO 13

²⁴ RPO 157

²⁵ Waterford MASP Policy Objective 6 (a)

development of Waterford, also reducing carbon footprint. The Office welcomes the following statement in the Issues Paper:

'New cycle ways and walkways are also a significant means of improving sustainable transport within/between communities and assisting in transitioning to a low carbon and climate resilient society'.

In view of the greenhouse gas (GHG) emissions from transport and the energy use for transport, it will be essential for the planning authority to achieve a significant modal shift in the county in order to meet the requirements under section 10(2)(n) of the Act.

The Office would therefore encourage the planning authority to include modal shift targets to be achieved over the plan period, aligned to relevant implementation measures, in order to achieve meaningful improvements in GHG emissions and energy use in line with section 10(2)(n) of the Act.

In respect of the provision of wastewater and water infrastructure, there is a need to work proactively with Irish Water to progress projects that deliver infrastructure for the county's settlements and support development in strategic development areas consistent with the NPF and RSES as referred to above under 'Core Strategy and Settlement Hierarchy'.

The implementation of the Design Manual for Urban Roads and Streets (as revised in 2019) in the required locations, consistent with RPO 151(g), will also assist sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

Economic Development & Employment

As noted above, Waterford's exceptional road, rail, sea and air transport infrastructure will provide regional and international connectivity. The Issues Paper states as follows:

'these links have the potential to stimulate employment led growth and regeneration across the city and county'.

The area of Waterford city and suburbs has a relatively good jobs to residential workers' ratio of 1.201, however some of the towns in the county are significantly below 1, including Portlaw (0.237), Dunmore East (0.373), and Tramore (0.419)²⁶, which would suggest a need for economic development and regeneration within the smaller towns and villages. It would also suggest a need to resolve potentially high outbound commuting patterns from existing settlements.

²⁶ Appendix 2 NPF

The metropolitan area of Waterford has the potential to provide for a significant retail catchment area, which would generate employment and service-related activity. The preparation of a Joint or Multi-Authority Retail Strategy²⁷, in collaboration with the neighbouring authorities, will provide a platform for future growth for the region, without adversely impacting on the retail viability and vitality in other smaller settlements in the region, and shall inform the upcoming development plan review. The retail strategy shall be consistent with the *Retail Planning Guidelines for Planning Authorities* (2012).

The proposed upgrading of Waterford's third level institution to a Technological University for the South East (TUSE) will allow Waterford to advance as a modern European University City, supporting innovation, creativity and enterprise. The forthcoming development plan shall provide for the necessary infrastructure and support for its future expansion²⁸.

Rural Development

The recognition in the Issues Paper of a strong tourism base, focused around natural environment and historic towns, is a welcomed statement which will play a positive role in driving economic development in terms of tourism potential.

NPO 17 of the NPF sets out an objective to enhance and protect built heritage in rural towns and villages, which will enhance the quality of life and encourage investment. This objective identifies the role that the natural environment and built heritage can play in enhancing quality of life.

Furthermore, tourism opportunities for greenways and blue ways²⁹ have the scope to attract significant visitors to the county, which in turn have the potential to generate direct and indirect employment opportunities and provide for rural diversification of the rural economy.

The protection of Gaeltacht areas is important in both national planning policy³⁰ and regional policy³¹. The forthcoming development plan should have appropriate measures to protect the cultural identity of Gaeltacht communities of An Rinn and An Sean Phobal and provide for measures for Gaeltacht competitiveness advantages for enterprise.

²⁷ Section 3.5 Section 28 Retail Planning Guidelines, 2012 & Waterford MASP Policy Objective 19

²⁸ Waterford MASP Objective 14

²⁹ RPO 200, RPO 201

³⁰ NPO 29

³¹ RPO 195, RPO 196, RPO 197

Strategic Flood Risk Assessment

The planning authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft development plan, consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009).

In this regard, the Office advises against the use of information from the Office of Public Work's (OPW) Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting land maps to inform the SFRA. The planning authority will need to take account of OPW Flood Relief Schemes and undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further more detailed analysis is required.

The forthcoming development plan review should have full regard to the proposed development of flood relief schemes in Aglish, Ballyduff and Dungarvan & Environs, Dunmore East, Portlaw, Ringaphuca, Tallow, Tramore & Environs and Waterford³²

The planning authority will need to undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further more detailed analysis is required.

Climate Action & Energy

The planning authority will be aware that the Office's evaluation of the plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act.

The promotion of renewable energy within the county in accordance with the section 28 *Wind Energy Development Guidelines* (2006), Circular Letter PL 5/2017: *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July 2017)*, or any replacement guidelines issued by the Minister, will also be critical to ensure Ireland meets its national targets and commitments to increase renewable energy supply and reduce greenhouse gas emissions.

In this regard, the attention of the planning authority is drawn, in particular, to the SPPR under the aforementioned interim guidelines. This requires, inter alia, that the planning authority indicate how the implementation of the relevant development plan or local area plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

Having regard to the Climate Action Plan 2019 and the objectives in the NPF³³ and RSES³⁴, the transition to a low carbon economy and the overall reduction in carbon emissions will become a

³³ NPO 53, NPO 54

³² The National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme

³⁴ RPO 87, RPO 88, RPO 89, RPO 90, RPO 91, RPO 94

central issue in planning policy during the cycle of the forthcoming development plan. It is understood that the forthcoming updates to the *Development Plan Guidelines* will include guidance in relation to preparing development plans having regard to the need to ensure policy measures, which reduce energy demand and greenhouse gas emissions.

The inclusion of the promotion of sustainable settlement and transport strategies for both urban and rural areas to include measures to reduce energy demand, greenhouse gas emissions, and to ad apt to climate change, having regard to location, layout and design of new development will be critical.

<u>Summary</u>

The Office commends your authority for the preparation of this Issues Paper and supporting consultation material, and for its strategies to engage with the community.

The Office advises your authority to pay particular attention to the following issues in the formulation of the county development plan:

- National and regional objectives for population growth, compact growth and regeneration in determining the Core Strategy, including the settlement hierarchy for your functional area. In this regard, the Office advises that a significant proportion of the county's future population growth should be directed to the Waterford MASP and key town of Dungarvan. Careful consideration should be given to zoning and population allocations to lower level settlements in the county settlement hierarchy in order to avoid any competing factors for the Waterford MASP and Key Town of Dungarvan.
- The policies and objectives across the Draft Plan should be consistent with Section 28 Guidelines, the Urban Development and Building Heights, Guidelines for Planning Authorities (2018) and the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, (2009), particularly in relation to residential density.
- Transportation and land-use policies should be informed by evidence-based strategies, including the Waterford Area Metropolitan Transport Strategy and Local Transport Plans.
- The development of rural housing policies that are consistent with NPOs 19 and 20 of the NPF, and which distinguish between areas under strong urban influence and elsewhere, and support the regeneration of rural towns and villages by directing residential development to serviced areas and facilitating more sustainable transport patterns.

- The preparation of a Joint or Multi-Authority Retail Strategy, in collaboration with the neighbouring authorities, in accordance with the *Retail Planning, Guidelines for Planning Authorities* (2012).
- The promotion of sustainable settlement and transport strategies for urban and rural areas with measures to reduce GHG emissions, reduce energy usage and to adapt to climate change. The plan should include targets for modal shift over the plan period aligned to specific implementation and monitoring measures.
- The promotion of renewable energy sources within the county in accordance with the relevant section 28 guidelines, and in particular the specific planning policy requirement (SPPR) of *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (July 2017).*

The Office looks forward to reviewing the plan and is committed to continued positive engagement with your authority in the implementation of national and regional policies at county and local level.

Please feel free to contact staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,

AM C'Onne

Anne Marie O'Connor Deputy Planning Regulator